



Exceptions to Policy Procedures

NCCPA reviews Exception to Policy (ETP) requests that pertain to a PA's inability to comply with an NCCPA board certification requirement within the specified timeframe due to severe, extenuating circumstances. Such requests are reviewed in accordance with NCCPA's *Policies Governing the Consideration of Requests for Exceptions to Policy*, except that ETP requests relating to the PANRE-LA examination are governed by the published *PANRE-LA Operational Policies, Procedures and Authorization*. PAs should review the applicable policy before submitting an ETP request.

Procedures Related to Exception to Policy Requests

1. **Board certification requirements for which ETP requests may be considered:**
 - Fee waiver requests will be reviewed at any time.
 - Fee refund requests will be reviewed at any time.
 - Requests to waive the 90-day wait between exam attempts will be reviewed at any time.
 - Initial PANCE Eligibility extension requests will be reviewed at any time after the exhaustion of 6 years and/or 6 attempts, whichever occurs first.
 - Recertification extension requests (to take and pass PANRE) will be reviewed at any time during the final year of the recertification cycle (6th or 10th year).
 - Board certification maintenance extension requests will be reviewed at any time during the second/year 2 of the current CME cycle (inability to earn and/or log CME credits by December 31st of the expiration year).
 - Board certification extension requests due to military deployment (outside of the United States) will be reviewed at any time.
 - Requests for an exception to the three (3) business day grievance policy must be submitted promptly, as soon as practicable after the extenuating circumstance that prevented compliance with the three (3) business day grievance policy allows.
 - CME audit requests pertaining to an extension of a first or second CME audit timeframe will be reviewed from the date of the audit notification through the date of the audit deadline.
 - Technical issues will be reviewed, if submitted within 72 hours of experiencing the technical challenge.
 - Inability to apply for PANRE-LA during the required timeframe due to an extenuating circumstance will be reviewed as set forth in the *Policies Governing the Consideration of Requests for Exceptions to Policy* and the published *PANRE-LA Operational Policies, Procedures and Authorization*.
 - Inability to complete the required number of quarters during the

administration of the PANRE-LA exam due to an extenuating personal medical issue will be reviewed as set forth in the published PANRE-LA Operational Policies, Procedures and Authorization.

Please note: If a PA does not earn or log all required CME credits and/or pay required fees by 11:59 pm PT, December 31, of the final year of the PA's board certification maintenance cycle, NCCPA will automatically grant a one-month Administrative Certification Extension to allow additional time for the completion of those requirements, subject to payment of the administrative certification extension fee. **Therefore, no ETP request for extension of board certification needs to be filed for overdue CME credits or fees, unless the PA will be unable to meet those requirements during the one-month Administrative Certification Extension period.**

2. What to Submit

- [NCCPA Request for Exception to Policy Form](#)
- Personal Statement
- Verifiable Supporting Documentation
- [Power of attorney or legal guardianship documentation](#), if applicable
- Non-attorney representation documentation, if applicable

A. **NCCPA Request for Exception to Policy Form**

A *NCCPA Request for Exception to Policy Form* must be submitted with each request. The request form should be completed and submitted to NCCPA by the PA, or a representative authorized to communicate with NCCPA on the PA's behalf. By signing and submitting this form, you authorize NCCPA to accept and verify all documentation submitted in relation to the request for exception to policy.

B. **Personal Statement**

NCCPA requires a signed personal statement from the PA in support of any ETP request. The personal statement should summarize:

- The nature of the ETP request (e.g., fee waiver, board certification extension)
- The extenuating circumstance(s) and when the circumstance(s) began and ended (if not ongoing)
- How the circumstance(s) prevented or will prevent compliance with the NCCPA requirement
- If requesting an extension, the expected timeframe for compliance with the applicable NCCPA requirement (e.g., extension for 6 months to earn CME credits, a statement that the PA expects to be able to sit for an exam in three months, after recovering from surgery)

C. **Verifiable Supporting Documentation**

NCCPA **requires** verifiable documentation in support of the extenuating circumstance(s) for each request. All documentation submitted to NCCPA in support of an exception to policy request will be **verified** by NCCPA Review and Appeals staff. If documentation cannot be verified, processing may be delayed

and, in some instances, requests will not be considered.

I. **Personal and/or Family Medical Issues:**

Requests for an exception to policy may be submitted for a medical issue experienced by the PA or by a family member whose medical condition has required the PA to serve as a caretaker.

A letter written on the letterhead of the treating healthcare provider and signed by the PA's and/or family member's treating provider must be submitted to NCCPA for a medically related circumstance. The letter must:

- Specifically state the nature of the medical issue, to the extent such information is relevant to the PA's request; and
- Specifically state the length of time the provider has been treating the PA or family member (begin and end date, if not ongoing); and
- Specifically state how the medical condition(s) prevented or will prevent the PA from complying with the policy; and
- Specifically state the length of time the treating provider feels is needed for the PA to meet the requirement(s) based on the medical condition.

Letters that omit this information may be treated as insufficient documentation.

Note: The treating provider letter will not be accepted from a direct coworker, family member, or supervising physician of the PA. It is not required, nor is it encouraged, to submit personal medical records. The treating provider letter should summarize and attest to any relevant medical issues.

II. **Other Extenuating Circumstance(s):**

Relevant supporting documentation may include:

- Copy of birth certificate for a newborn or legal documents for a child for whom the PA has a new adoptive placement
- Copy of military deployment orders
- Newspaper reports, photos, or governmental agency announcements of catastrophic weather-related or other catastrophic events or natural disasters (e.g., forest fires, earthquakes, hurricanes, terrorist event, house fire, flood), together with a statement describing how the event necessitates the ETP request
- Copy of family member's death certificate and/or obituary listing the PA as a relative of the deceased
- Documents establishing the time burden on the PA of a family member's death or serious illness (e.g., copy of appointment as

executor or documentation establishing the PA's need to serve as caregiver while family member was ailing)

- Court documents relating to legal proceedings
- Disability or FMLA documents
- Screen shots that demonstrate technical difficulty

D. Power of Attorney ("POA") or legal guardianship documents or notarized non-attorney representative letter

NCCPA communicates directly with PAs and, if applicable, their legal counsel. With a written, signed, and notarized request or pursuant to a properly scoped Power of Attorney or legal guardianship document, a PA can authorize a non-attorney representative to communicate with NCCPA on the PA's behalf. In the absence of a Power of Attorney or legal guardianship, the PA's signed and notarized request to appoint a non-attorney representative must present extenuating circumstances that warrant departure from NCCPA's rule requiring the PA himself or herself to communicate with NCCPA.

3. Review and Decisions of ETP Requests

NCCPA's Review and Appeals staff will conduct the review of ETP requests and notify the PA of the outcome within forty-five (45) business days.

NCCPA will only consider ETP requests that include all required relevant items listed in Section 2 of this document. Requests received without the required supporting documentation will be considered incomplete and will not be processed. All ETP requests that do not adequately document how a qualifying extenuating circumstance prevented compliance with an established NCCPA requirement and/or policy will be denied.

NCCPA Review and Appeals staff will verify the authenticity of the documentation provided in support of an extenuating circumstance(s). Letters submitted as supporting documentation should be written on company letterhead with company name, address and phone number for verification purposes. All other forms of supporting documentation must include relevant details regarding the circumstance that can easily be verified via phone, web, mail and/or fax.

NCCPA Review and Appeals staff will make an initial decision on complete ETP requests, except in situations (other than temporary administrative extensions) where an extension of PANCE eligibility is requested due to either the exhaustion of six exam attempts or six years, or in other instances where referral to the NCCPA Review Committee is deemed appropriate. In those instances, cases will be directly referred to NCCPA's Review Committee for an initial decision, as described in NCCPA's [Review and Appeal Policy and Procedures](#). Please note if the request is referred to the NCCPA Review Committee for an initial decision, a delay may occur in receiving a decision on the request until such time the NCCPA Review Committee has met and reviewed the request.

Decisions will be based on the information in the request, supporting documentation, applicable policy language, and the PA's board certification history, which may include reviewing previous requests and disciplinary actions taken. Delays in decisions may occur if a PA is subject to a disciplinary proceeding with NCCPA before a decision is made on the PA's ETP request. In that instance, the PA will be notified of the delay and next steps in the process.

4. Request for Review and Appeal Rights

If a PA disagrees with an adverse decision regarding an ETP request, a Request for Review may be submitted in accordance with the *Review and Appeal Policy and Procedures*.

5. Temporary Extensions

If a PA submits a Request for Review of a ETP request that was denied in full or in part, or if a case is referred to the Review Committee for an initial decision, NCCPA may in its sole discretion grant a temporary extension of the PA's board certification, pending the Review Committee decision, to avoid a lapse in board certification while awaiting the review of the PA's request. During such time of the extension, the PA will not be permitted to complete outstanding requirements until permitted by the Review Committee to do so (i.e., take an exam, earn CME credits that count towards their required CME balance, etc.). Board certified PAs whose request for an ETP extending their board certification is denied by the Review Committee will need to apply to regain their board certification before scheduling a PANRE exam. In making the determination of whether to grant a temporary extension in these circumstances, NCCPA will consider the following and any other factors NCCPA deems relevant:

- Whether a PA's board certification will lapse prior to the date of the assigned Review Committee Meeting;
- Whether a PA's board certification will lapse due to a missed administrative requirement, at a time other than when the year-end Administrative Certification Extension would take effect;
- Whether an NCCPA requirement was not met due to an NCCPA error.

In addition, NCCPA may grant a single one-month administrative extension of a PA's initial PANRE eligibility to PAs whose graduation date from an accredited PA program results in the expiration of their six-year PANRE eligibility period during the time that testing has ended for the calendar year in December. In the absence of extenuating circumstances, board certified PAs seeking to maintain their board certification will not be granted an administrative extension to take PANRE, other than as set forth above, but may be eligible for an Administrative Certification Extension to earn or log CME credits or pay fees. See <https://www.nccpa.net/resources/ace/>.

6. Responsibility for Notification of Address Changes

PAs are solely responsible for ensuring that their NCCPA account includes the PA's current mailing and email address and for monitoring those addresses for

communications from NCCPA. A PA's failure to notify NCCPA in a timely manner of a change of address, to designate NCCPA as a trusted sender on their email account, or to monitor their mail or email shall not be considered as an extenuating circumstance for an exception to policy or a basis for an appeal or reconsideration of any administrative or disciplinary decision, even if, as a result of that failure, the PA did not have actual notice of the NCCPA communication.

7. Communication with NCCPA

Requests and supporting documentation may be submitted in the following ways:

- Mail
- Fax
- Email

Contact information:

NCCPA Review and Appeals Department
12000 Findley Road
Suite 100
Johns Creek, GA 30097
reviewandappeals@nccpa.net

Phone: (678) 417-8100

Fax: (678) 417-8135

Last Revised: August 2023